

N24 Knockagh Pavement Overlay

Environmental Impact Assessment
Screening Report

May 2023

Project number: 2021s0172

Tipperary County Council

Final

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Contract

This report describes work commissioned by Tipperary County Council by a letter dated 26/1/2021. Conor O'Neill of JBA Consulting carried out this work.

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Purpose

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Abbreviations

- AA - Appropriate Assessment
- CDP - County Development Plan
- EIAR - Environmental Impact Assessment Report
- NIAH - National Inventory of Architectural Heritage
- NIS - Natura Impact Statement
- NHA - Natural Heritage Area
- NMS - National Monuments Service
- SAC - Special Area of Conservation
- SPA - Special Protection Area
- TII - Transport Infrastructure Ireland
- WFD - Water Framework Directive

1 Introduction

JBA Consulting Engineers and Scientists Ltd. (hereafter JBA) has been commissioned by Tipperary County Council to prepare an Environmental Impact Assessment (EIA) Screening Document for a proposed pavement overlay scheme on the N24 at Knockagh, Co. Tipperary (the 'proposed development'). The proposed development consists of repaving of the road surface, reprofiling of road cross section, and minor realignment to improve radii and superelevation.

1.1 Purpose of this Report

The purpose of this report is to identify whether there is a need under the Planning and Development Regulations or under the Roads Act (1993-2016) for an EIAR for the proposed development.

Section 50 of the Act lists the groups of road development projects which are subject to EIAR screening under the EIA Directive 2011/92/EU, as amended by Directive 2014/52/EU. Part 1 (a) of the Act lists those projects which are automatically subject to an EIAR due to the scale and nature of the project. Parts 1 (b-d) list projects which are also likely to have significant environmental effects based on the nature and size of the development set out by threshold criteria. If such projects are found likely to have significant environmental effects, An Bord Pleanála may direct the road authority to prepare an environmental impact assessment.

Article 120(1)(a) of the Regulations directs local authorities to prepare a preliminary assessment of subthreshold developments they intend to undertake in order to determine whether it will have significant effects on the environment. This EIA Screening Report examines the proposed development under the criteria outlined in Article 120(1)(a), i.e., the nature, size, and location of the development.

This report documents the methodology employed to determine whether the proposed development falls under any of these groups, and therefore will have significant environmental impacts. Rationale has been given for the decision made in reference to the relevant legislation, and additional documents have been referenced where required.

This report is intended for the project as described below. Any significant changes to the project description or location would require preparation of a new EIA Screening report.

An Appropriate Assessment (AA) Screening Report has been prepared by Moore Group Environmental Services and has identified any potential impacts to Natura 2000 sites and protected sites. This EIA Screening document, along with the AA Screening Report, will be submitted as part of the planning process for the proposed development.

2 Description of Proposed Works

2.1 Site Location

The proposed development is located on the existing N24 in the townland of Knockagh, Co. Tipperary. The development is located 3km east of Cahir and 9km west of Clonmel in Co. Tipperary. The scheme is approximately 1.3km in length.

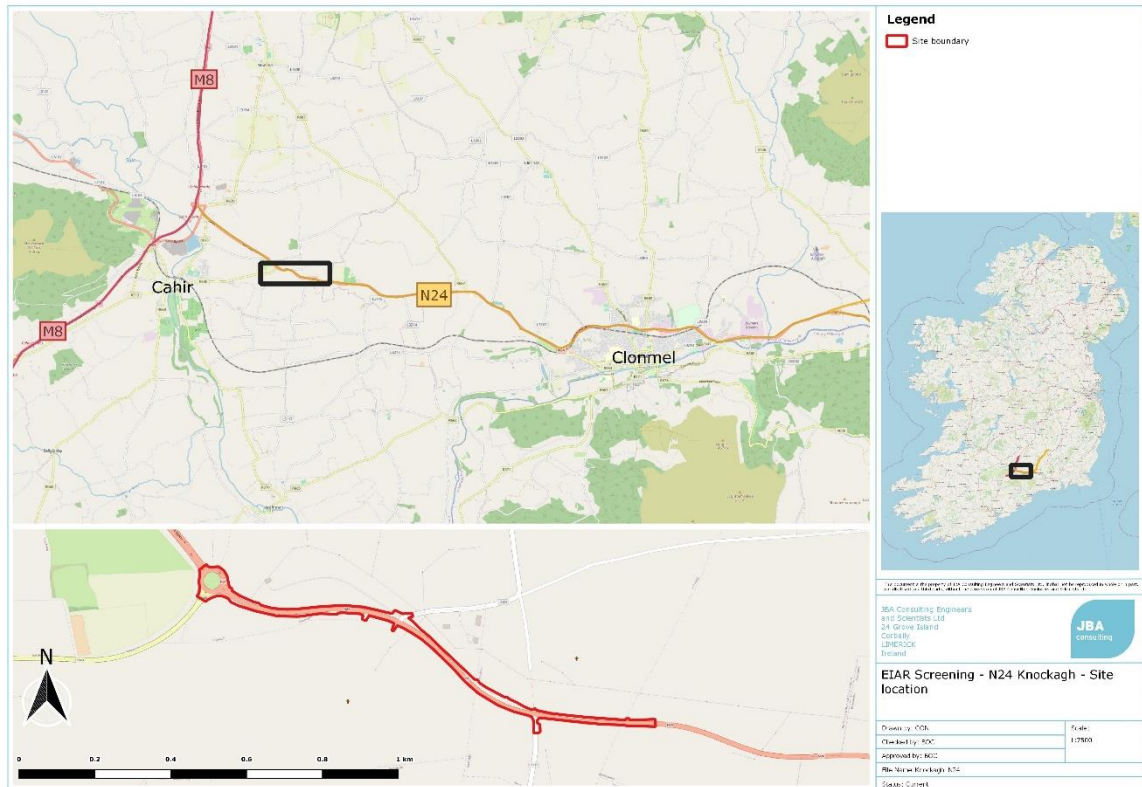


Figure 2.1: Site Location

2.2 Proposed Development

Tipperary County Council has proposed to undertake pavement repairs along the N24 through Knockagh. The proposed scheme is approximately 1.3km in length and will include repaving of the road surface (inlay and overlay), reprofiling of road cross section, and minor realignment to improve turn radii and superelevation. Surface drainage will be provided by the existing N24 drainage systems.

Figure 2.2 shows the proposed development details.

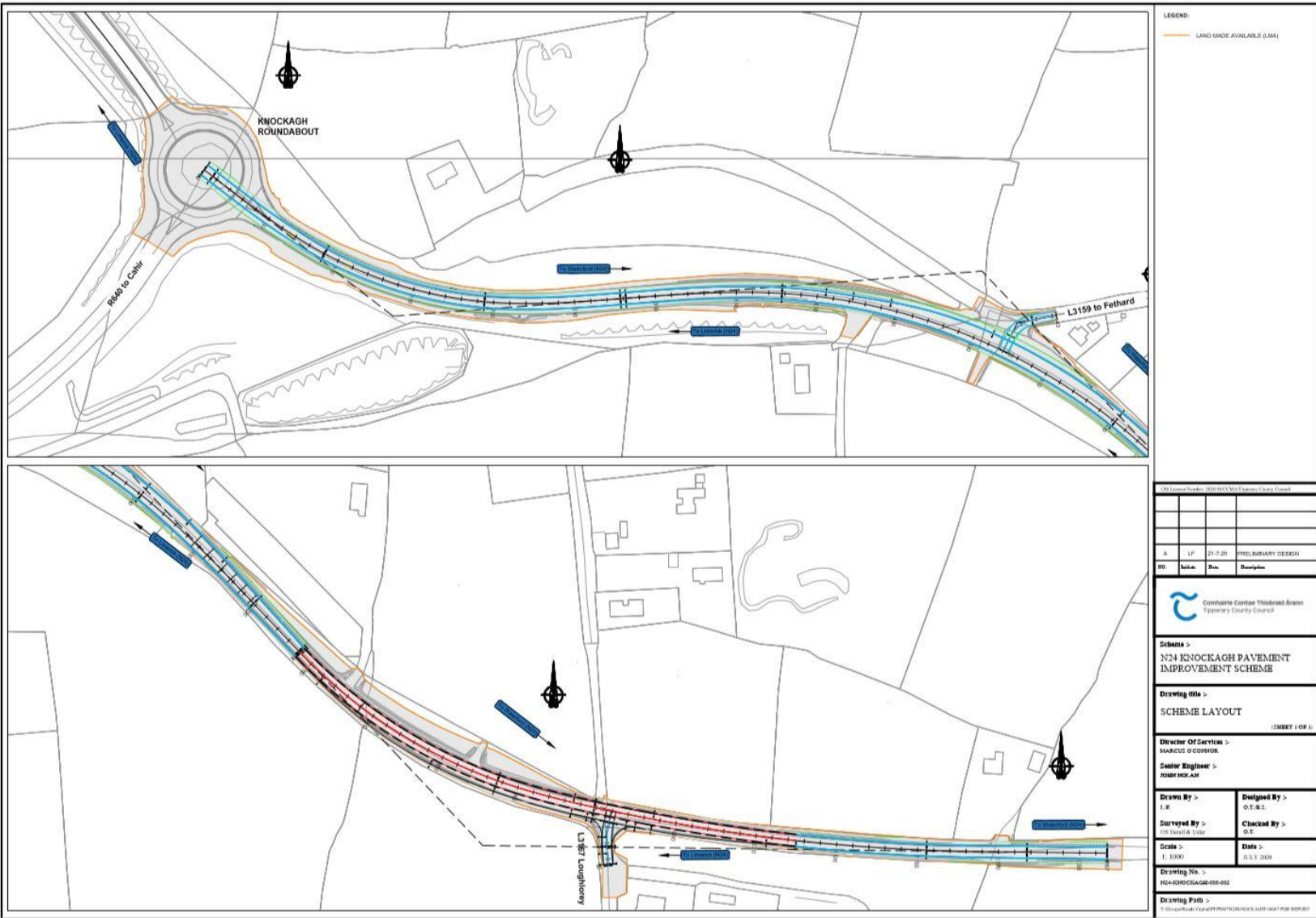


Figure 2.2: Proposed development details

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3 Purpose of Screening

3.1 Legislative Context for EIAR in Ireland

The EU has set out mandatory requirements for Environmental Impact Assessments under the EIA Directive 2011/92/EU (as amended by Directive 2014/52/EU). The Directive identifies certain project types, described under Annex I, that will always have significant environmental effects due to their nature and size. These projects are required to undergo an EIAR in every Member State, and are listed in Section 50 Part 1 (a) of The Roads Act as such.

For projects listed under Annex II, the EIA Directive gives Member States discretion to decide the limits of projects requiring an EIAR. In Ireland, mandatory thresholds have been set for projects that would otherwise fall under Annex II, which are described in Section 50, Parts 1 (b-d) of The Roads Act 1993, as amended. These thresholds are based on project characteristics including size and location. Projects within these thresholds are always subject to an EIAR. In some circumstances, projects considered below the thresholds set under Section 50 Parts 1 (b-d) may still be considered by the Planning Authority or An Bord Pleanála (ABP) to have significant effects on the environment, such as in cases where the projects are in a location of particular environmental sensitivity, and may also be subject to an EIAR. These sub-threshold projects are reviewed by the Planning Authority and ABP on a case-by-case basis.

The principal pieces of legislation under which an EIAR may be undertaken for local authority development and road developments are the Planning and Development Act 2000, as amended, the Planning and Development Regulations, as amended, and The Roads Act 1993, as amended. Further regulations are explained in the European Union (Roads Act 1993) (Environmental Impact Assessment) (Amendment) Regulations 2019.

Legislation is examined below as to whether an EIAR will be required for this project.

3.2 The Roads Act 1993 (as amended) - Mandatory EIAR

The relevant summaries of legislative requirements for EIA Screening for road developments are set out in Table 3.1 below.

Table 3.1: Mandatory EIA for road projects, adapted from NRA (2008)

Mandatory		Regulatory Reference
1) Construction of a motorway		S. 50(1)(a)(i) of the Roads Act, 1993, as substituted by S.I. No. 279/2019
2) Construction of a busway		S. 50(1)(a)(ii) of the Roads Act, 1993, as substituted by S.I. No. 279/2019
3) Construction of a service area		S. 50(1)(a)(iii) of the Roads Act, 1993, as substituted by S.I. No. 279/2019
4) Any prescribed type of road development consisting of the construction of a public road or the improvement of an existing road, namely:	The construction of a new road of four or more lanes, or the realignment or widening of an existing road so as to provide four or more lanes, where such new, realigned or widened road would be eight kilometres or more in length in a rural area, or 500 metres or more in length in an urban area;	Article 8 of the Roads Regulations, 1994 (Road development prescribed for the purposes of S. 50(1)(a) of the Roads Act, 1993)
	The construction of a new bridge of tunnel which would be 100 metres or more in length.	

Mandatory	Regulatory Reference
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(5) Where An Bord Pleanála (ABP) considers that a proposed road development would be likely to have significant effects on the environment it shall direct the road authority to prepare an EIS.	S. 50(1)(b) of the Roads Act, 1993
(6) Where a road authority considers that a proposed road development would be likely to have significant effects on the environment it shall inform ABP in writing and where ABP concurs it shall direct the road authority to prepare an EIS.	S. 50(1)(b) of the Roads Act, 1993
(7) In particular, where a proposed development (other than development to which paragraph (a) applies) consisting of the construction of a proposed public road or the improvement of an existing public road would be located on	<p>S. 50(1)(d) of the Roads Act, 1993, as inserted by Art. 14(a) of the EIA (Amendment) Regulations, 1999.</p> <p>(i) a European Site within the meaning of Regulation 2 of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011),</p> <p>(ii) land established or recognised as a nature reserve within the meaning of section 15 or 16 of the Wildlife Act 1976 (No. 39 of 1976),</p> <p>(iii) land designated as a refuge for fauna or flora under section 17 of the Wildlife Act 1976 (No. 39 of 1976), or</p> <p>(iv) land designated a natural heritage area under section 18 of the Wildlife (Amendment) Act 2000</p>

The proposed development will consist of repaving of the road surface, reprofiling, and some minor realignment, of approximately 1.3km length. It is considered that the proposed scheme does not fall under any of the categories outlined above. Therefore, an EIAR has not been automatically triggered for this proposed development.

3.3 Sub-threshold EIAR

In accordance with Article 120(1)(a) of the Planning and Development Regulations, where a local authority proposes to carry out a subthreshold development, the authority shall carry out a preliminary examination of at least the nature, size, and location of the development, in order to determine whether the development would or would not be likely to have significant effects on the environment. In order to make this determination, the proposed development will be examined under three groups of criteria as set out below:

- Characteristics of Proposed Development
- Location of Proposed Development
- Characteristics of Potential Impacts

For the purposes of assessing if the development is likely to have significant effects on the environment in reference to these three parameters, the project is examined below in further detail.

4 Overview of Environmental Impacts

An overview of the potential environmental impacts of the development, according to theme presented in an EIAR, is provided below.

4.1 Population and Human Health

When operational, it is likely that the development will have a positive impact on population and human health, by increasing sightline distances on bends and improving superelevation, thereby improving road safety.

There is a risk to the health and safety of workers on the development, as well as nuisance associated with traffic disruption, dust, noise, and vibration, during the construction phase. This will be mitigated against by operational plans devised by the contractor, and will be temporary in nature.

4.2 Biodiversity

Ecological receptors that must be examined include protected Natura 2000 sites under the Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC), as well as species protected under the Wildlife Act (1976), and any ecological receptors which may be negatively impacted by the proposed development, both directly and indirectly.

4.2.1 Proximity to Protected Sites

An Appropriate Assessment (AA) Screening Report was completed for this development by Moore Group Environmental Services. The Screening Report considered all Natura 2000 sites in the potential zone of impact of the development (within 15km). These are shown in Table 4.1

Table 4.1: Natura 2000 sites within 15km of the proposed development

Natura Site	Site Code	Approximate distance from site
Lower River Suir SAC	002137	2.4km
Galtee Mountains SAC	000646	11.49km

There is no connectivity between the proposed scheme and Galtee Mountains SAC. Lower River Suir SAC is located 2.4km west of the scheme, though there are no watercourses which drain the scheme and there is no connectivity with the River Suir.

There will be no direct impacts on the Lower River Suir SAC as a result of this development, nor any habitat loss or fragmentation. Indirect effects, such as a detrimental change in water quality in the River Suir due to indirect pollution, were also found to be unlikely. The AA Screening Report therefore concluded that the proposed development will have no significant effects on any Natura 2000 sites, and that it is not necessary to undertake an Appropriate Assessment.

The AA Screening Report also considered Natural Heritage Areas and Proposed Natural Heritage Areas, designated under the Wildlife Act. It found that there is no likely impact on these sites as a result of the proposed development.

4.3 Soils and Geology

The underlying bedrock of the site is composed of massive mud-grade limestones.

The subsoil on site is primarily shale and sandstone till, with a narrow section of alluvium and karstified limestone bedrock just east of Knockagh Roundabout. No excavations into this subsoil are proposed as part of this development.

Any potential impacts would occur via accidental spills and leaks from machinery operating on the site during the construction phase, causing localised contamination to soils. Standard measures to mitigate impacts on soils and water courses will be detailed in operational plans devised by the appointed contractor.

4.4 Hydrology and Hydrogeology

4.4.1 Surface Water

The proposed site lies within the Suir catchment and WFD Suir_SC_120 sub-catchment as designated under the Water Framework Directive (WFD).

No EPA waterbodies are in the vicinity of the proposed development.

The nearest waterbody is approximately 2km east of the development, where the Husseystown Stream crosses beneath the N24 in the townland of Woodrooff. The stream is Good status under the WFD 2013-2018.

4.4.2 Groundwater

Groundwater vulnerability within the site is variable from rock at or near the surface, extreme, or high (Figure 4.1). The area supports a Regionally Important karstified bedrock aquifer, capable of supporting regionally important abstractions (GSI, 2017).

4.4.3 Hydrological Impacts

There are no predicted impacts to surface and groundwater bodies once the proposed development is operational. Surface runoff will drain into the existing N24 drainage systems, including an existing attenuation pond to the south west of the scheme which was constructed as part of the M8 Motorway works. No increase in runoff as a result of the proposed development is expected, and there is therefore little divergence from existing conditions.

During construction, there is the potential for emissions of dust and silt into waterways. Construction should be undertaken in accordance with the standard best practice TII Guidelines for the Crossing of Watercourses during the Construction of National Road Schemes (NRA, 2008) and with 'Control of Water Pollution from Construction Sites – Guidance for Consultants and Contractors' published by CIRIA (2001).

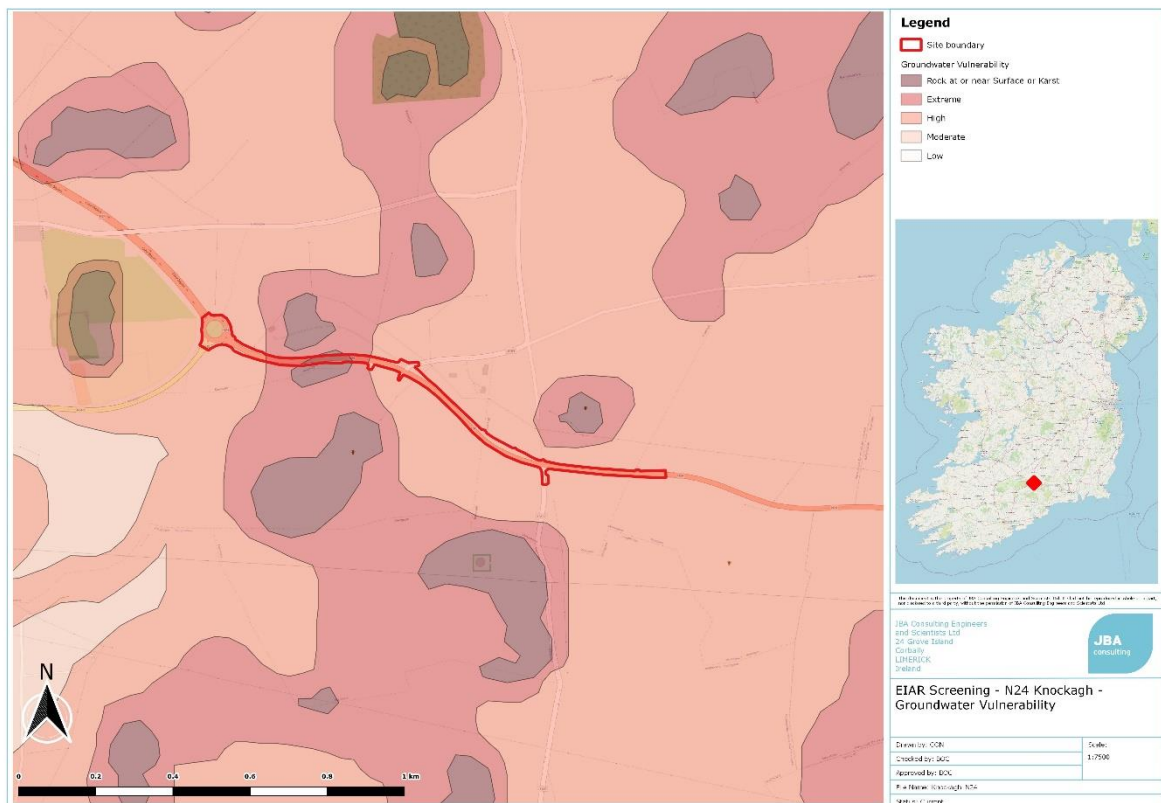


Figure 4.1: Groundwater Vulnerability

4.5 Cultural Heritage

There are no archaeological features or protected structures within the proposed site boundary. Figure 4.2 shows features of interest in the area around the site.

There are 7 ringforts or raths and 1 standing stone in the area, which range from 170-450m from the scheme area. There are no recorded archaeological features of the National Monuments Service (NMS) within or bordering the site.

Excavations are not required for the proposed development, with the work consisting of pavement upgrade, reprofiling of road surface, and some minor realignment. Therefore encounters with underground archaeology are unlikely.

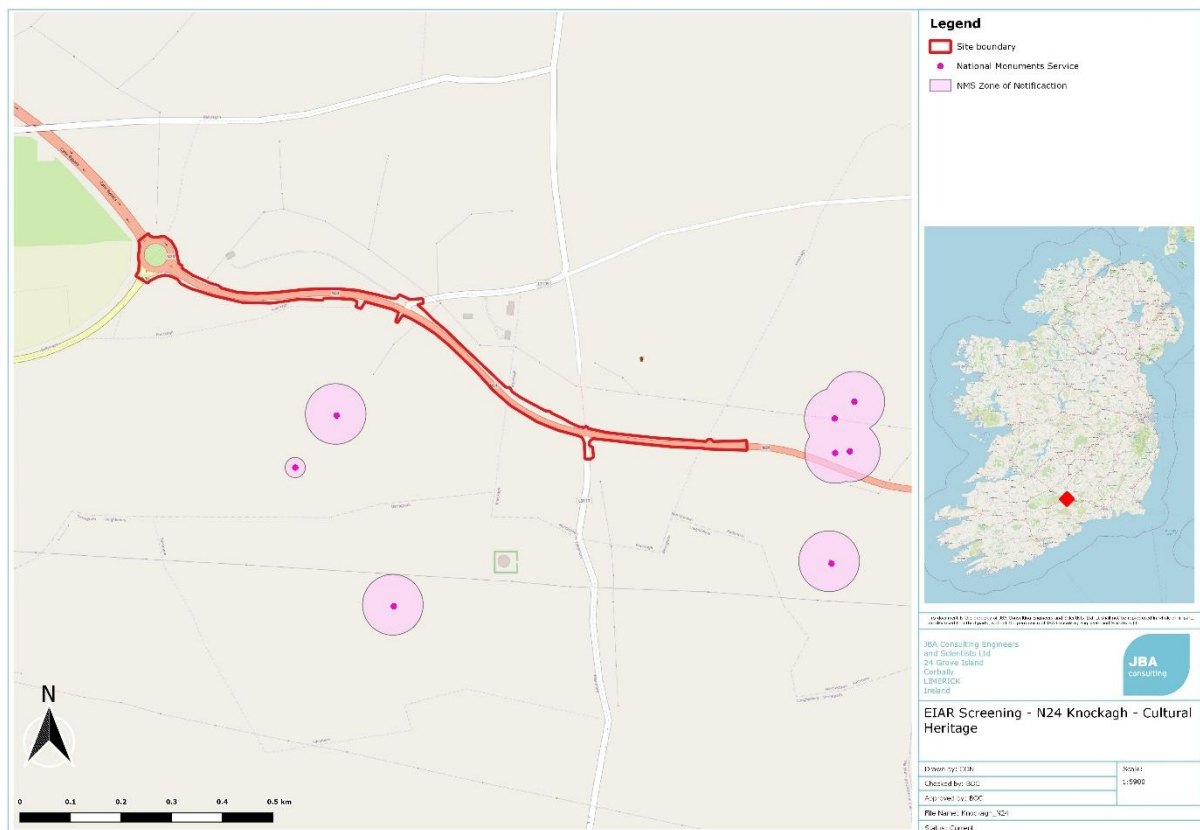


Figure 4.2: Archaeological and architectural sites near the proposed development

4.6 Air, Noise and Climate

There is potential for impacts to air and noise quality through emissions during the construction phase of the development, due to the operation of machinery on site and transport of materials to and from the site. Any such impacts will be temporary and localised in nature. Construction should be undertaken in accordance with the TII Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes (NRA, 2011).

When operational, impacts to air, noise and climate emissions will be similar to existing.

4.7 Landscape and Visual

The proposed development will give rise to temporary landscape or visual impacts to residents living in proximity to the development during the construction phase.

There are no protected landscapes or views within the site. There is one scenic view located north of the site on a local road; it will not be impacted by the development. The Landscape Character Assessment for Co. Tipperary is discussed in Section 4.9.1.

There will be no landscape and visual impacts when operational.

4.8 Material Assets including Traffic, Utilities, and Waste

4.8.1 Traffic

During construction, there will be a temporary disruption to local traffic.

During the operational stage, traffic will be similar to existing levels. Safety will be improved by increased sightline distances and superelevation.

4.8.2 Utilities

Existing surface water drainage will be used by the proposed development.

4.8.3 Waste

Waste generated during construction will be collected and disposed of with licensed facilities, in line with the TII Management of Waste from National Road Construction Projects guidelines (TII, 2017).

4.9 Cumulative Impacts

4.9.1 Plans

Tipperary County Development Plan 2022-2028

The Tipperary County Development Plan 2022-2028 has been prepared in accordance with the Planning and Development Act 2000. The plan sets out the overall strategy for planning and sustainable development in the county. Included in the plan is a Landscape Character Assessment (LCA) for Co. Tipperary. The proposed development is within the River Suir Central Plain area, an area of robust sensitivity (the least sensitive designation in the LCA) with high capacity to absorb development. A key regional transport priority, as noted in the Development Plan, for Tipperary is the N24 upgrade project. The N24 is a key strategic link from Limerick to Waterford.

4.9.2 Projects

Planning applications in the near vicinity from the last three years that have been granted permission are listed below. Applications which are not retention applications, home extensions and/or internal alterations are considered.

Planning Application Reference	18600194
Development address	Rathmore, Cahir, Co. Tipperary
Description: development of cattle house with slatted tank and lie back area, also Retention Permission for two cattle houses incorporating lie back area and feeding area and all associated works on my land	
Final Decision on Application	Grant permission with conditions
Decision Date	10-Jul-2018

The potential for cumulative impact of the plans and projects identified above are assessed in the Screening section below in combination with the currently proposed project.

5 Screening Assessment

5.1 Characteristics of the Proposed Development

To determine whether the characteristics of the proposed development are likely to have significant impacts on the environment, the following questions are answered in Table 5.1, following guidelines set out in Environmental Impact Assessment of National Roads Schemes - A Practical Guide (NRA, 2008).

Table 5.1: Characteristics of the proposed development

Characteristics of the Proposed Development - Screening Questions	Comment
Could the scale (size or design) of the proposed development be considered significant?	The proposed development will consist of repaving of the N24 road surface through Knockagh, with some reprofiling to improve superelevation and realignment to improve bend radii, over a length of approximately 1.3km. The scale of the proposed development is therefore not considered significant.
Considered cumulatively with other adjacent proposed developments, would the size of the proposed development be considered significant?	All planning applications granted permission in the area around the proposed development in the last three years are small scale. There are no planning applications currently being decided in the area. As such, the cumulative effect is not expected to be significant.
Will the proposed development utilise a significant quantity of natural resources, in particular land, soil, water or biodiversity?	There is no land take or excessive use of resources expected, with the current road corridor not being widened at any point.
Will the proposed development produce a significant quantity of waste?	No. No excavation is required for the development. Waste will be limited to typical road project and construction waste. The contractor should adhere to the TII Management of Waste from National Road Construction Projects guidelines.
Will the proposed development create a significant amount or type of pollution?	No. During the construction stage, there will be a risk of some pollution via silt or hydrocarbons to local minor surface water pathways. This will be temporary in nature, and can be limited by the contractor following standard best practice guidelines.
Will the proposed development create a significant amount of nuisance?	No. During construction, some noise will be created, however this will be temporary and short-term. Construction works will be limited to certain times of day to avoid nuisance to local residences.
Will there be a risk of major accidents having regard to substances or technologies used?	No. The risks of this development will be those typically associated with normal construction practices. Construction machinery will be used during the construction phase and will be operated by licensed contractors, following best practice guidance.

<p>Will there be a risk of natural disasters which are relevant to the project, including those caused by climate change?</p>	<p>No. The proposed development is not within CFRAM flood zones A or B, and therefore is not at risk of flooding or any other natural disasters.</p>
<p>Will there be a risk to human health (for example due to water contamination or air pollution)?</p>	<p>No. Any potential risk to human health will be as a result of the construction phase of this project. All contractors will be subject to best practice methodologies and risk assessments in order to minimize any risk to human health.</p>
<p>Would any combination of the above factors be considered likely to have significant effects on the environment?</p>	<p>No. The development is relatively small scale. Environmental impacts are predictable and easily mitigated through the use of best practice guidance during the construction phase. As such, significant impacts on the environment are not expected as a result of the proposed development.</p>

Conclusion: The characteristics of the proposed development are not considered likely to result in a significant impact on the environment by virtue of its size, nature or operational activities.

Reasoning: The proposed development is relatively small in extent and scope. Any environmental or noise impacts will be during the construction phase and not during operation of the development. Construction will not require significant use of natural resources, nor will it generate significant amounts of waste.

5.2 Location of the Proposed Development

The following questions are answered below in Table 5.2 to determine whether the geographical location of the proposed development can be considered ecologically or environmentally sensitive.

Table 5.2: Location of the proposed development

Location of the Proposed Development - Screening Questions	Comment
Has the proposed development the potential to impact directly or indirectly on any site designated for conservation interest (e.g. SAC, SPA, pNHA)?	No. The AA Screening for the site concluded that the development is not likely to have any impact on Lower River Suir SAC or any other Natura 2000 sites.
Has the proposed development the potential to impact directly or indirectly on any habitats listed as Annex I in the EU Habitats Directive?	No. The AA Screening for the development found that there is no potential for impacts on any Annex I habitats.
Has the proposed development the potential to impact directly or indirectly on any habitats listed as Priority Annex I in the EU Habitats Directive?	No. The AA Screening for the development found that there is no potential for impacts on any Priority Annex I habitats.
Has the proposed development the potential to impact directly or indirectly on any species listed as Annex II in the EU Habitats Directive?	No. The AA Screening for the development found that there is no potential for impacts on any Annex II species.
Has the proposed development the potential to impact directly or indirectly on the breeding places of any species protected under the Wildlife Act?	No. The proposed development will not involve any land take or expansion of the road surface. Impacts on ecological receptors (such as breeding places) are not expected. The AA Screening also found that there is no potential for impacts on any Natural Heritage Areas or Proposed Natural Heritage Areas, designated under the Wildlife Act.
Has the proposed development the potential to impact directly or indirectly on the existing or approved land use?	No. The land use before and after development will be the same.
Has the proposed development the potential to significantly impact directly or indirectly the relative abundance, availability, quality or regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground?	No. The proposed development will not impact the relative abundance, availability, or regenerative capacity of natural resources. Surface runoff is expected to be the same as existing.
Has the proposed development the potential to impact directly or indirectly on any protected structures or Recorded Monuments and Places of Archaeological Interest?	No. No such structures or monuments are located within the project boundary. No excavation is required for the development, as the resurfacing will be by overlay and inlay.
Has the proposed development the potential to impact directly or indirectly on listed or scenic views or	No. There are no listed or scenic views or protected landscapes in the CDP which could be impacted by the development.

**protected landscapes as outlined in
the County Development Plan?**

Conclusion: The location of the proposed development is not considered likely to have a significant impact on the environment.

Reasoning: The proposed development will be relatively low impact, with temporary impacts during the construction phase. When operational, safety on this stretch of the N24 will be increased due to increased sightline distances and improved superelevation. An AA Screening for the development found that no impacts are expected on Natura 2000 sites or NHAs/pNHAs.

5.3 Characteristics of Potential Impacts

The following questions were answered in Table 5.3, in line with Guidance on EIA Screening - June 2001, prepared for the European Commission by ERM (UK), to determine whether the environmental impacts of the development can be considered significant.

Table 5.3: Characteristics of potential impacts

Characteristics of Potential Impacts - Screening Questions	Comment
Will there be a large change in environmental conditions?	No. Impacts are likely to occur only during the construction stage; these will be temporary in nature. Operational impacts will be positive, with improved safety due to improved road conditions.
Will new features be out of scale with the existing environment?	No. The proposed development is the same extent of the current road surface.
Will the effect be particularly complex?	No. The primary environmental impacts are expected to occur during the construction phase, and will be mitigated by adherence by the contractor to best practice guidelines as published by TII.
Will the effect extend over a large area?	No. The proposed development is only likely to impact the same extent of the current road surface.
Will there be any potential for trans-frontier impacts?	No.
Will many people be affected?	Users of the road will be affected temporarily during construction. Some nuisance may be experienced by local residents.
Will many receptors of other types (fauna and flora, businesses, facilities) be affected?	No. The AA Screening found that the potential impacts arising from this development will be limited in terms of biodiversity and temporal scale. Impacts on other receptors are expected to be temporary and limited to the construction phase.
Will valuable or scarce features or resources be affected?	No. There will be no effect on scarce features or resources such as Natura 2000 sites or significant cultural heritage sites.
Is there a risk that environmental standards will be breached?	No. The appointed contractor will be contractually obligated to follow TII best practice guidelines, which contains mitigation measures designed to follow environmental standards.
Is there a risk that protected sites, areas, features will be affected?	No, as concluded by the AA Screening Report for the development.
Is there a high probability of the effect occurring?	No.
Will the effect continue for a long time?	No. Potential impacts would be brief to temporary, only occurring occasionally within the construction phase of the development or in the case of a breach of environmental standards.
Will the effect be permanent rather than temporary?	No. Potential impacts would be temporary.
Will the impact be continuous rather than intermittent?	No. Potential impacts would be intermittent.

If it is intermittent will it be frequent rather than rare?	No. Potential impacts would be rare, occurring only in the case of accidental breach of environmental standards during the construction phase.
Will the impacts be irreversible?	No.
Will it be difficult to avoid, or reduce or repair or compensate for the effect?	No. Mitigation measures are set out in the TII best practice guidance, and are commonly used and easily implemented.

Conclusions: The characteristics of the potential impacts as a result of the proposed development are unlikely to be significant and are easily mitigated. There are no predicted negative impacts during the operation of the proposed development, with several positive impacts expected.

Reasoning: The potential impacts from this development would be during the construction phase. It is easy to predict these impacts and mitigate them through the use of environmental procedures outlined in TII best practice guidelines.

6 Conclusions and Recommendations

The purpose of this report was to identify whether there is a need under The Roads Act 1993, as amended, for an EIAR for the proposed N24 pavement overlay at Knockagh, Co. Tipperary.

The proposed development comprises approximately 1.3km of road resurfacing, with reprofiling to improve superelevation and realignment to improve bend radii.

It was determined that the proposed development does not fall under Section 50 Part 1 (a) or Parts 1 (b-d) of the Act. As such, an EIAR has not been automatically triggered. To determine whether the development may fall under the category of sub-threshold development, with the potential to give rise to significant environmental effects, a screening exercise was undertaken.

There is potential for impacts to arise during the construction phase due to contaminated surface water or the creation of dust which may impact air quality with secondary impacts to residents, biodiversity, and water quality. Such impacts are expected to be unlikely to occur, temporary only and limited to the duration of the construction phase. Impacts can also be limited by adherence to TII best practise guidelines for National Roads projects.

An AA Screening Report (Moore Group Environmental Services) determined that there are no likely impacts on any Natura 2000 sites as a result of the development. It also made the same conclusion regarding NHAs and pNHAs.

Operational impacts of the development will be increased road safety along this stretch of the N24. As such, the proposed development will likely have long term beneficial effects.

It is concluded that the proposed development does not fall under the category of sub-threshold development, and therefore does not require an EIAR.

7 References

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